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Schroders plc

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BLACKROCK, INC.,

Plaintiff,

v.

SCHRODERS PLC,

Defendant.

07 CV 3183 (PKL)
ECF CASE ELECTRONICALLY FILED

NOTICE OF DEFENDANT'S MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, dated May 7, 2007, the accompanying Declaration of Christine N. Kearns, Esq., dated May 7, 2007, the accompanying Declaration of Howard Trust, dated May 2, 2007, the accompanying Declaration of Oliver Driver-Polke, dated May 7, 2007, and on all prior proceedings and pleadings had herein, Defendant Schroders plc, will move this Court, before the Honorable Peter K. Leisure, United States District Judge, 500 Pearl Street, New York, New York, on a date and time to be decided by the Court when counsel can be heard, for an order:

(1) pursuant to Fed. R. Civ. P. 12(b)(2) dismissing Plaintiff's Complaint because this Court lacks personal jurisdiction over Defendant Schroders plc; or,

(2) dismissing Plaintiff's Complaint on the ground of *forum non conveniens*.

For these reasons, as more fully set forth in the accompanying papers, the Complaint in its entirety should be dismissed.

PLEASE TAKE FURTHER NOTICE, that pursuant to Southern District of New York Local Rule 6.1(b), answering papers, if any, shall be served within ten business days after service of the papers herein.

Dated: New York, NY
May 7, 2007

/s/ Frederick A. Brodie

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